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Attorneys for Plaintiff Abhinav Bhatnagar

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ABHINAV BHATNAGAR,

Plaintiff,

vs.

JASON INGRASSIA, individually and in
his official capacity; COUNTY OF
CONTRA COSTA; and CITY OF
SAN RAMON.

Defendants.

Case No.: 3:07-cv-02669 (CEB)(EDL)

**STIPULATION RE: EXCLUSION OF
EVIDENCE RE: PLAINTIFF'S PAST OR
CURRENT IMMIGRATION STATUS**

Trial Date: December 8, 2008

Time: 8:30 am

Honorable Charles R. Breyer

JUSTICE FIRST, LLP

All parties, by and through their respective counsel, hereby stipulate that there will be no evidence presented by way of documents, testimony, or argument concerning Plaintiff's current or past immigration status. This does not preclude either party from asking questions as to Plaintiff's ethnicity or the defense from introducing into evidence Defendant Ingrassia's testimony that he questioned Plaintiff regarding his place of birth.

IT IS SO STIPULATED:

Dated: November 25, 2008
Oakland, California

JUSTICE FIRST, LLP

Attorneys for Plaintiff Abhinav Bhatnagar
By:

/s/ Jenny Huang

Jenny C. Huang
2831 Telegraph Avenue
Oakland, CA 94609

Dated: November 25, 2008
Martinez, California

JANET HOLMES

Attorney for Contra Costa County and
the City of San Ramon

By:

/s/ Janet Holmes

Ms. Janet Holmes
Contra Costa County Counsel's Office
651 Pine Street, 9th Floor
Martinez, CA 94553

Dated: November 25, 2008
Walnut Creek, California

JAMES FITZGERALD

Attorney for Defendant Jason Ingrassia
By:

/s/ James Fitzgerald

Mr. James Fitzgerald
McNamara Dodge et al. LLP
P. O. Box 5288
Walnut Creek, CA 94596-1288

PURSUANT TO STIPULATION, IT IS SO ORDERED.

December 01
Dated: ~~November~~ December, 2008

UNITED STATES

